

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JIMMY VARGA,
Plaintiff,

V.

WELLS FARGO BANK, N.A.,
Defendant.

CIVIL ACTION NO. 4:17-cv-00265-Y

**APPENDIX TO PLAINTIFF'S EMERGENCY MOTION TO QUASH UNILATERAL
DEPOSITION NOTICE AND FOR PROTECTIVE ORDER AND BRIEF IN SUPPORT
THERE TO**

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APPENDIX “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JIMMY VARGA,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

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CASE NO. 4:17-CV-265-Y

NOTICE OF INTENT TO TAKE ORAL DEPOSITION OF JIMMY VARGA

TO: Plaintiff Jimmy Varga, by and through his attorney of record, Daena G. Ramsey, 32000 East Lamar Blvd. Suite 430, Arlington, Texas 76006.

Please take notice that Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) will take the deposition of Plaintiff Jimmy Varga on **July 25, 2018 at 10:00 a.m.** continuing from day to day until its completion pursuant to the Federal Rules of Civil Procedure. The deposition will be taken at Locke Lord LLP, 2200 Ross Avenue, Suite 2800, Dallas, Texas 75201, and will be taken before an officer authorized by law to take oral depositions and may be videotaped. The deposition is being taken for the purpose of discovery, for the use at trial, and for all other uses permitted under the Federal Rules of Civil Procedure.

Respectfully submitted,



Robert T. Mowrey

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Locke Lord LLP

2200 Ross Avenue, Suite 2800
Dallas, Texas 75201
(214) 740-8000
(214) 740-8800 (Facsimile)

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon the following by certified mail, return receipt requested and/or email pursuant to the Federal Rules of Civil Procedure, on this 16th day of July, 2018:

Daena G. Ramsey
dramsey@vrlaw.net
Vaughan & Ramsey
2000 East Lamar Blvd. Suite 430
Arlington, Texas 76006
T: (972) 262-0800
F: (972) 642-0073
Attorney for Plaintiff



Attorney for Defendant

APPENDIX “B”



2200 Ross Avenue, Suite 2800
Dallas, TX 75201
Telephone: 214-740-8000
Fax: 214-740-8800
www.lockelord.com

Matthew L. McDougal
Direct Telephone: (214) 740-8459
Fax: (214) 740-8800
matthew.mcdougal@lockelord.com

July 16, 2018

VIA CERTIFIED MAIL, RETURN
RECEIPT REQUESTED 92147969009997901622451850
AND EMAIL

Daena G. Ramsey
Vaughan & Ramsey
2000 East Lamar Blvd. Suite 430
Arlington, Texas 76006
dramsey@vrlaw.net

Re: *Jimmy Varga v. Wells Fargo Bank, N.A.*; in the United States District Court for the Northern District of Texas; Fort Worth Division, Civil-Action No. 4:17-CV-265-Y.

Dear Ms. Ramsey:

Enclosed please find attached Defendant Wells Fargo Bank, N.A.'s *Notice of Intent to take the Oral Deposition of Jimmy Varga* on **July 25, 2018 at 10:00 a.m.** in the above-referenced matter. Based on our previous conversations with a representative of your firm on Friday, July 13, 2018 and Monday, July 16, 2018, respectively, we have selected this date in an effort to complete discovery in compliance with the Court's current scheduling order.

If this date is not amenable to you, please provide us with additional dates to depose your client within the current discovery deadline, which is **Friday, July 27, 2018**. If your client is otherwise unavailable, I would urge reconsideration of your resistance to joining a motion to modify the scheduling order to allow the parties additional time to complete discovery.

Please call me with any questions, or if you would like to discuss this matter further.

Sincerely,

A handwritten signature in black ink that reads "Matthew L. McDougal". The signature is written in a cursive, flowing style.

Matthew L. McDougal

Enclosure

cc: Jennifer Kinney Parnell [Firm]
Arthur E. Anthony [Firm]
Robert T. Mowrey [Firm]

APPENDIX “C”

Chris Chapaneri

From: McDougal, Matthew L. <Matthew.McDougal@lockelord.com>
Sent: Monday, July 16, 2018 5:18 PM
To: Daena Ramsey; Chris Chapaneri
Cc: Mowrey, Robert T.; Kinney Parnell, Jennifer; Anthony, Art E.
Subject: RE: Varga [Jimmy] v. Wells Fargo Bank, NA - Notice of Intent to take Deposition
Attachments: WF_Varga letter to opposing counsel enclosing Defendant's Notice of Intent to take Deposition-c.pdf; Notice of Deposition-Jimmy Varga-c.pdf

Daena,

Please find attached Defendant Wells Fargo Bank, N.A.'s *Notice of Intent to take the Oral Deposition of Jimmy Varga* on **July 25, 2018 at 10:00 a.m.** in the above-referenced matter. If this date is not amenable to you, please provide us with additional dates to depose your client within the current discovery deadline, which is **Friday, July 27, 2018.**

Please don't hesitate to call me with any questions, or if you would like to discuss this matter further.

Best regards,

Matthew L. McDougal
Attorney
Locke Lord LLP
2200 Ross Avenue
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Dallas, TX 75201
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